

EXHIBIT 4



N.C. HAVA ADMINISTRATIVE COMPLAINT FORM

**FRAUDULENTLY OR FALSELY COMPLETING THIS FORM IS A CLASS I FELONY
UNDER CHAPTER 163 OF THE NC GENERAL STATUTES.**

Any person who believes that there is a violation of any provision of Title III of the Help America Voting Act (HAVA), 52 U.S.C. §§ 21081–21102, may file a complaint. A complaint shall be in writing and notarized, signed and sworn by the complainant. You (the complainant) may use: (1) this form prescribed by the State Board of Elections; or (2) any other document providing the same information required in this Board-prescribed form, if signed and notarized.

A complaint shall be filed within 30 days after the occurrence of the actions or events that form the basis for the complaint, including the actions or events that form the basis for your (complainant's) belief that a violation is about to occur, or, if later, within 30 days after you knew or, with the exercise of reasonable diligence, should have known of those actions or events. The complaint is filed when it is either: delivered to 430 N. Salisbury St., Third Floor, Raleigh, N.C.; mailed to P.O. Box 27255, Raleigh, N.C. 27611; faxed to (919) 715-0135 to the attention of the General Counsel of the State Board of Elections; or scanned and emailed to legal@ncsbe.gov. The complainant shall also mail, fax, email, or otherwise deliver a copy of the complaint to each state or local election official or board whose actions are asserted to have been in violation of Title III of HAVA. More information on the procedures as to this complaint can be found on the website of the State Board of Elections at www.ncsbe.gov or you may call the State Board at (919) 814-0700.

PLEASE PRINT AND ADD ADDITIONAL PAGES IF NEEDED

1. My name, address, phone numbers, and e-mails are (please print)

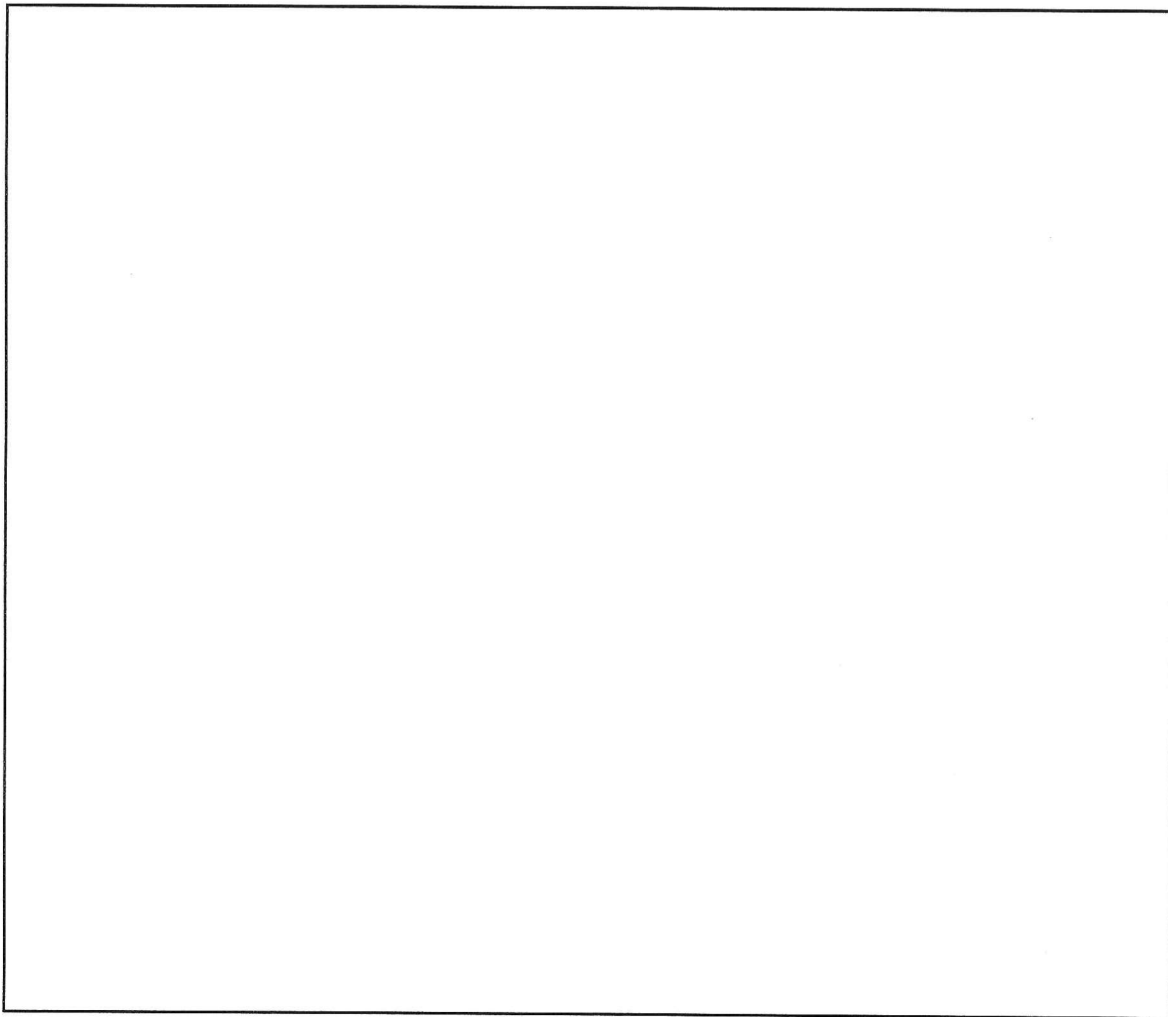
Carol L. Snow
6281 Jenkins Rd; Morganton NC 28655
(828) 448-4680
cls28655@gmail.com

2. I am alleging a violation of Title III of HAVA as follows (mark all that apply):

- ☐ 52 U.S.C. § 21081 (Section 301) (Voting systems standards and accessibility)
- ☐ 52 U.S.C. § 21082 (Section 302) (Provisional voting and voting information)
- ☒ 52 U.S.C. § 21083 (Section 303) (Voter registration and voter identification)

3. As to each violation alleged above, state in detail the circumstances of the alleged violation, election officials involved, and what occurred as a result of the alleged violation. (Please print)

Please see attached. This amended complaint is my operative complaint.



Dated October 6, 2023.

Carol S. Snow
Signature of Person Complaining

STATE OF NORTH CAROLINA, COUNTY OF Burke

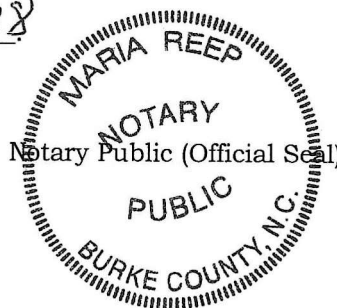
The forgoing complaint was sworn to as true and subscribed before me this day by

Carol Snow

My Commission Expires 7-27-28

Maria Reep
Signature of Notary Public

Maria Reep
Printed Name of Notary Public





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UNDER CHAPTER 163 OF THE NC GENERAL STATUTES.

I am alleging a violation of Title III of HAVA as follows (mark all that apply)

☒ 52 U.S.C. § 21083 (Section 303) (Voter registration and voter identification)

3. As to each violation alleged above, state in detail the circumstances of the alleged violation, election officials involved, and what occurred as a result of the alleged violation. (Please print)

Section 303(a)(5) of the Help America Vote Act, Public Law 107-252 enacted on 10/29/2002 ([see page 46](#)), reads as follows:

(5) VERIFICATION OF VOTER REGISTRATION INFORMATION.—

(A) REQUIRING PROVISION OF CERTAIN INFORMATION BY APPLICANTS.—

(i) IN GENERAL.— Except as provided in clause (ii), notwithstanding any other provision of law, an application for voter registration for an election for Federal office may not be accepted or processed by a State unless the application includes—

(I) in the case of an applicant who has been issued a current and valid driver's license, the applicant's driver's license number; or

(II) in the case of any other applicant (other than an applicant to whom clause (ii) applies), the last 4 digits of the applicant's social security number.

(ii) SPECIAL RULE FOR APPLICANTS WITHOUT DRIVER'S LICENSE OR SOCIAL SECURITY NUMBER.— If an applicant for voter registration for an election for Federal office has not been issued a current and valid driver's license or a social security number, the State shall assign the applicant a number which will serve to identify the applicant for voter registration purposes. To the extent that the State has a computerized list in effect under this subsection and the list assigns unique identifying numbers to registrants, the number assigned under this clause shall be the unique identifying number assigned under the list.

However, it is not clearly indicated on the **NC Voter Registration Application Form** nor in the video entitled "**Register to Vote in North Carolina**" posted on YouTube on 8/17/2021 by the North Carolina State Board of Elections, that the applicant's qualifying identification of the applicant's driver's license number or last 4 digits of the applicant's social security number, are required if one or the other have been issued to the applicant.

Register to Vote in North Carolina video

<https://www.youtube.com/watch?v=ZvYUqIFgpw0>

At the 1:47 mark, the narrator begins, "Let's look at a voter registration application. The required fields on the application are in red. These are the eligibility requirements: your name, date of birth, residential address, mailing address, and your signature. Once you complete the application..."

Notice there is no mention of the requirement for those who have been issued a driver's license to provide the number, or for those without a driver's license to provide the last 4 digits of their social security number, if they possess one.

NC's Voter Registration Application

https://s3.amazonaws.com/dl.ncsbe.gov/Voter_Registration/NCVoterRegForm_06W.pdf

The application indicates that (fields in red text are required), which to the reader would imply only the fields in red text are required. Further, these fields are also highlighted in red tint.

Note neither the fields for the NC Driver's License/NC DMV ID Number field nor Last 4 Digits of the Social Security Number are in red font, nor highlighted in red tint, which would imply that these fields are not required.

NORTH CAROLINA VOTER REGISTRATION APPLICATION (fields in red text are required)		2023.04	06w
1 Indicate whether you are qualified to vote or preregister to vote based on U.S. citizenship and age.			
Are you a citizen of the United States of America?		<input type="checkbox"/> Yes <input type="checkbox"/> No	
IF YOU CHECKED "NO" IN RESPONSE TO THIS CITIZENSHIP QUESTION, DO NOT SUBMIT THIS FORM. YOU ARE NOT QUALIFIED TO VOTE			
Will you be at least 18 years of age on or before election day?		<input type="checkbox"/> Yes <input type="checkbox"/> No	
Are you at least 16 years of age and understand that you must be 18 years of age on or before election day to vote?		<input type="checkbox"/> Yes <input type="checkbox"/> No	
IF YOU CHECKED "NO" IN RESPONSE TO BOTH OF THESE AGE QUESTIONS, DO NOT SUBMIT THIS FORM. YOU ARE NOT QUALIFIED TO REGISTER OR PREREGISTER TO VOTE.			
2 Provide your full legal name.		3 Provide your date of birth and identification information.	
Last Name	Suffix	Date of Birth (MM/DD/YYYY)	State or Country of Birth
First Name		NC Driver License or NC DMV ID Number	Last 4 Digits of Social Security Number
Middle Name		Check if you do not have a driver license or Social Security number. State voter Registration Number (Optional: To locate, check "Voter Lookup" at www.NCSBE.gov.)	

For those who choose to read the APPLICATION INSTRUCTIONS on the back page of the North Carolina Voter Registration Application, it states that the date of birth is required. However, it is not clear to the reader if the applicant is required to complete the NC Driver License or NC DMV ID Number and/or Last 4 digits of Social Security Number fields. The current instructions, as written, could be considered ambiguous to the applicant.

The following instructions would not be ambiguous: “If you have a NC driver license or non-operator’s identification number, you are required to provide this number. If you do not have a NC driver license or ID card, but you do have a social security number, you are required to provide the last four digits of your social security number.”

Specific Instructions for Each Numbered Section of the Application:

1	Indicate whether you are qualified to vote or preregister to vote: (1) you must be a citizen of the United States; (2) you must be at least 18 years of age, or you will be 18 years of age by the next general election and you are voting in the primary, or you must be between the ages of 16 or 17 and desire to preregister to vote; (3) you must have resided in North Carolina and in the precinct in which you present to vote for at least 30 days prior to the election; (4) you have not been convicted of a felony, or if so, you have completed your sentence (including any probation, post-release supervision, or parole).
2	Provide your full legal name. If your name has changed, this form will be used to update your current voter registration.
3	You are required to provide your date of birth. If you have a NC driver license or non-operator’s identification number, provide this number. If you do not have a NC driver license or ID card, then provide the last four digits of your social security number. If you have neither a NC driver license, NC DMV ID card or a social security number and you are registering to vote for the first time in North Carolina, attach a copy of a current utility bill, bank statement, government check, paycheck, or other government document that shows your name and address to this application.

Below is a NC Voter Registration Application that was received in Rowan County on 1/21/2020. Notice the application only states the Name and Date of Birth are required in this section.

NORTH CAROLINA VOTER REGISTRATION APPLICATION
Please use black ink and print legibly.

<p>1 Are you a citizen of the United States of America? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>IF YOU CHECKED "NO" IN RESPONSE TO THIS QUESTION, DO NOT SUBMIT THIS FORM.</p>	<p>Will you be at least 18 years of age on or before election day? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Are you at least 16 years of age and understand that you must be 18 years of age on or before election day to vote? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>IF YOU CHECKED "NO" IN RESPONSE TO BOTH OF THESE QUESTIONS, DO NOT SUBMIT THIS FORM.</p>
<p>2 Last Name (Required): <u>Philip S. Owens</u></p> <p>First Name (Required): <u>Linda</u></p> <p>Middle Name (Optional): <u>Kayle</u></p> <p><input type="checkbox"/> Jr. <input type="checkbox"/> Sr. <input type="checkbox"/> II <input type="checkbox"/> III <input type="checkbox"/> IV <input type="checkbox"/> V</p>	<p>3 Date of Birth MM/DD/YYYY (Required): <u>01/21/1980</u> State of Birth/Country of Birth: _____</p> <p>If you know your NC Voter Registration Number, enter it below: _____</p> <p>If you have a NC driver's license or non-operator ID card, enter the number below: _____</p> <p>Enter the last 4 digits of your SSN: _____ <input type="checkbox"/> Check here if you do not have a NC driver's license, ID card, or a SSN.</p>

Compare this to the Federal Voter Registration Application

https://www.eac.gov/sites/default/files/eac_assets/1/6/Federal_Voter_Registration_ENG.pdf

Voter Registration Application			
Before completing this form, review the General, Application, and State specific instructions.			
Are you a citizen of the United States of America? <input type="checkbox"/> Yes <input type="checkbox"/> No		This space for office use only.	
Will you be 18 years old on or before election day? <input type="checkbox"/> Yes <input type="checkbox"/> No			
If you checked "No" in response to either of these questions, do not complete form. (Please see state-specific instructions for rules regarding eligibility to register prior to age 18.)			
1 <input type="checkbox"/> Mr. <input type="checkbox"/> Miss Last Name		First Name Middle Name(s) <input type="checkbox"/> Jr <input type="checkbox"/> II <input type="checkbox"/> Sr <input type="checkbox"/> IV	
2 Home Address		Apt. or Lot #	City/Town State Zip Code
3 Address Where You Get Your Mail If Different From Above		City/Town	State Zip Code
4 Date of Birth Month Day Year	5 Telephone Number (optional)	6 ID Number - (See item 6 in the instructions for your state)	
7 Choice of Party (see item 7 in the instructions for your State)	8 Race or Ethnic Group (see item 8 in the instructions for your State)		
9 I have reviewed my state's instructions and I swear/affirm that: ■ I am a United States citizen ■ I meet the eligibility requirements of my state and subscribe to any oath required. ■ The information I have provided is true to the best of my knowledge under penalty of perjury. If I have provided false information, I may be fined, imprisoned, or (if not a U.S. citizen) deported from or refused entry to the United States.		Please sign full name (or put mark) ▲ Date: Month Day Year	

If you are registering to vote for the first time: please refer to the application instructions for information on submitting copies of valid identification documents with this form.

And its accompanying **Application Instructions** are clear. **Box 6 – ID Number:** Federal law requires that states collect from each registrant an identification number.

Box 6 — ID Number

Federal law requires that states collect from each registrant an identification number. You must refer to your state's specific instructions for item 6 regarding information on what number is acceptable for your state. If you have neither a drivers license nor a social security number, please indicate this on the form and a number will be assigned to you by your state.

OMB Control No. 3265-0015

State Instructions

North Carolina

Updated: 03-01-2006

Registration Deadline —
Postmarked 25 days before the election or received in the elections office or designated voter registration agency site by 5:00 p.m. 25 days before the election.

6. ID Number. Provide your North Carolina driver's license number, or North Carolina Department of Motor Vehicles ID number. If you do not have a driver's license, then list the last four digits of your social security number.

According to data received on 8/23/2023 from Public Records Request [#23-128](#), the NC voter rolls dated *9/30/2023 contained **217,436 Voters' Registration Records** and an additional **541 Voters' Registration Records** with an unknown or likely incorrect registration date (01/01/1900 and registered prior to 1909), for a total of **217,977** voter registration records, all with a status making the voters eligible to vote, but these records are missing **both** an NC Driver License or NC DMV ID Number **and** the last 4 digits of their Social Security Number.

These voters' registration dates are either after the required date to comply with the Help America Vote Act of 1/1/2004, or their registration dates are unknown.

<https://ncsbe-nc.nextrequest.com/requests/23-128>

Requested Remedies

1. Please revise all versions of the **NC Voter Registration Application** to use red colored text and red tinted background for all required personal identifying information, including the Driver License number if issued, or if no Driver License, the last 4 digits of their Social Security Number if issued.
2. Please revise the "**Register to Vote in North Carolina**" video posted on YouTube on 8/17/2021 by the North Carolina State Board of Elections to be consistent with the above changes.
<https://www.youtube.com/watch?v=ZvYUqIFgpw0>
3. Please revise all versions of the **NC Voter Registration Application** to make it a requirement to "*Check if you do not have driver license or Social Security number*" when both numbers are not provided.
4. Old versions of the **NC Voter Registration Application** form will not be accepted.
5. Please make North Carolina compliant with Sec 303(a)(5)(A) of the Help America Vote Act of 2002, by obtaining this required identifying information, if possessed, from the **217,977** Registered voters who registered on or after 1/1/2004, or their registration date is unknown, but are missing this personal identifying information.

Thank you for your consideration.